

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.: 1:20 CR 00015
	)	
Plaintiff,	)	JUDGE DONALD C. NUGENT
	)	
vs.	)	
	)	
KENNETH DAVIS	)	<b>MOTION FOR PREPARATION OF</b>
	)	<b>A PRE-PLEA PRE-SENTENCE</b>
Defendant.	)	<b>REPORT – CRIMINAL HISTORY</b>
	)	<b>ONLY</b>

Now comes the Defendant, Kenneth Davis, by and through his counsel, Steve W. Canfil, and hereby respectfully moves this Honorable Court to refer the instant matter to the United States Probation Office for the purpose of preparation of a pre-plea, pre-sentence report, criminal history only. Counsel is aware of certain prior offenses; however, Counsel and Defendant need to be certain of Defendant's status before engaging in negotiations with the Government. The preparation, and receipt by counsel, of such information would be of value to the Defendant and Counsel and would assist in the potential resolution of this matter. This request is made to ensure that the Defendant is fully informed of the sentencing consequences he would face upon conviction. The government has indicated that they do not oppose the granting of this Motion. In order to assist the Court in an efficient disposition of this case, it is respectfully requested that this motion be granted.

/S/STEVE W. CANFIL  
Steve W. Canfil (#0001297)  
55 Public Square, Ste. 2100  
Cleveland, Ohio 44113  
(440) 227-3017/(216) 363-6033  
[sfcanf@gmail.com](mailto:sfcanf@gmail.com)

Counsel for Defendant Davis

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion for Preparation of a Pre-Plea Pre-Sentence Report, Criminal History Only, was electronically filed this 4<sup>th</sup> day of February, 2020. Notice of this filing will be sent to counsel of record for all parties by operation of the Court's Electronic Filing System.

**/S/STEVE W. CANFIL**  
STEVE W. CANFIL, ESQ.  
Attorney for Defendant